

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern
Rachel Perillo

Tel: (212) 571-5500
Fax: (212) 571-5507

May 15, 2023

BY ECF

Hon. Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Nancy Salzman
Ind No.: 19 Cr. 204 (NGG)

Dear Judge Garaufis:

Nancy Salzman, by counsel, has submitted under seal a motion for reduced sentence pursuant to 18 U.S.C. § 3582(c) (1)(A)(i) in the referenced matter. It is respectfully requested that the Court grant Movant's sealing application on the ground the motion is based largely upon the denial of necessary medical care to our client, and therefore is rife throughout with description and analysis of Ms. Salzman's prior medical history, current medical status, medical records, and expert opinions, including exhibits, which derive from evaluation of confidential medical records.

Additionally, it is respectfully requested that the Court fix an expedited briefing schedule given the emergent nature of Movant's application, and grant the earliest possible date for the parties to appear for argument of any issues in dispute.

Thank you very much for your attention.

Respectfully,

Robert A. Soloway

Robert A. Soloway

cc: AUSA Tanya Hajar
RAS:sc